

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	1
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

**PERMIT TO
CONSTRUCT/OPERATE EVALUATION**

Applicant's Name	DISNEYLAND RESORT
Company ID	800189
Mailing Address	1313 S. HARBOR BLVD., ANAHEIM, CA 92802
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
PROCESS 3: ORGANIC SOLVENT SURFACE COATING					
SPRAY BOOTH (PORTABLE INTRA-FACILITY), FLOOR TYPE, SHOP PRO EQUIPMENT, MODEL NO. 5410, 20'-0" W. X 8'-0" L. X 8'-0" H., WITH TWO EXHAUST FILTERS, 20" X 20" X 2", AND A 1 ½ HP EXHAUST BLOWER. A/N 519363	D305			PM (9) [RULE 404, 2-7-1986] ROG (9) [RULE 1107, 11-9-2001; 1-06-2006; RULE 1136, 06-14-1996; RULE 1171, 11-7-2003; 05-01-2009]	A63.2, B27.5, C6.1, D322.1, E175.1, H23.2, K67.2
SPRAY BOOTH, BENCH TYPE, SPRAY SYSTEMS, INC., MODEL NO. BB-96, 8'-4" W. X 7'-4" L. X 4'-8" H., WITH TWENTY FILTERS, 20" X 25", AND A 0.75 HP EXHAUST BLOWER. A/N 519365	D306			PM (9) [RULE 404, 2-7-1986] ROG (9) [RULE 1107, 11-9-2001; 1-06-2006; RULE 1136, 06-14-1996; RULE 1171, 11-7-2003; 05-01-2009]	A63.2, B27.5, C6.1, D322.1, E175.1, H23.2, K67.2

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	2
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
PROCESS 3: ORGANIC SOLVENT SURFACE COATING					
SPRAY BOOTH, FLOOR TYPE, SPRAY SYSTEMS, INC., MODEL NO. I-1487, 15'-0" W. X 8'-3" L. X 10'-8" H., WITH TWENTY FOUR FILTERS, 20" X 25", AND A 2 HP EXHAUST BLOWER. A/N 519366	D307			PM (9) [RULE 404, 2-7-1986] ROG (9) [RULE 1107, 11-9-2001; 1-06-2006; RULE 1136, 06-14-1996; RULE 1171, 11-7-2003; 05-01-2009	A63.2, B27.5, C6.1, D322.1, E175.1, H23.2, K67.2

A/N 519361:

RECLAIM/TITLE V PERMIT REVISION, DE MINIMIS SIGNIFICANT

BACKGROUND:

Disneyland Resorts filed A/Nos 519363, 519365, & 519366 on March 11, 2011 as new construction for installation of 3 spray booths (one portable). Disneyland is an amusement park in business of providing rides and entertainment. The proposed spraybooths will be used by the maintenance crew for touch up and paint various surfaces after the repair work is performed. The company proposes to use low VOC products (< 50 g/l) for this purpose. Acetone (Non-VOC) is used as solvent for cleaning.

This facility is in the RECLAIM/Title V program. A/N 519361 was filed for the RECLAIM/Title V permit revision (de minimis significant). The latest Title V renewal was issued on 08/03/2007. This application is part of the 5th Title V permit revision since then.

The facility has been operating with a Title V permit since 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints, Notices to Comply, or Notices of Violation issued in the last two years.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	3
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

PROCESS DESCRIPTION:

The portable booth under a/no. 519363 will be used by the maintenance crew at various locations within the theme park for surface preparation and spray coating operations. The coating materials used will contain less than 50 g/l of VOC. Acetone will be used as clean-up solvent.

The stationary booths under a/no.s 519365 & 66 will also be used for same purposes as the portable one. The Bench type booth will also be using Aerosol cans and airbrush in addition to spray guns. All 3 booths will be using Acetone as clean-up solvent.

The operating hours are 6 hours/day, 5 days/week, 52 weeks/yr for all the booths. However, for emissions purposes, the operating hours of 6 hours/day, 7 days/week, 52 weeks/yr will be used.

EMISSIONS AND ANALYSIS:

ROG:

The company has agreed to limit VOC increase to no more than 14 lbs/month from all 3 booths. A permit condition to that effect will be included in the facility permit for all 3 booths. With the use of products containing < 50 g/l of VOC, the facility will be able to stay below VOC emissions of less than 14 pounds/month.

ROG:

$14 \text{ lb/month} / 30 \text{ days/month} = 0.47 \text{ lb/day}$, $0.078 \text{ lb/hr} / 3 \text{ booths} = 0.03 \text{ lb/hr/booth}$.

Annual VOC Emissions

$14 \text{ lb/month} \times 12 \text{ months/year} = 168 \text{ lb/yr} / 3 \text{ booths} = 56 \text{ lb/yr/booth}$

PM emissions from spraying will be negligible.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	4
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

TOXIC EVALUATION:

The MSDS submitted with the applications indicates that Disneyland will be not be using any materials that contain toxic air contaminants identified in Table 1 of Rule 1401. Therefore, no further evaluation is required for toxics.

RULES:

- RULE 212(c)(1) This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. This facility is not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.
- RULE 212(c)(2) This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in subparagraph (g). The emission increase from this project is less than the daily maximums. Therefore, public notice will not be required by this section.
- RULE 212(c) (3) There are no toxic emissions from this equipment as the company doesn't plan to use any material that contains toxic air contaminants. Therefore public notice will not be required by this section.
- RULE 212(g) This section requires a public notice for all new or modified permit units which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximums as specified in subparagraph (g). The maximum potential VOC emissions from this equipment are less than 0.5 lb/day; therefore, public notice will not be required by this section
- RULE 401 Visible emissions are not expected with proper operation of this equipment.
- RULE 402 Operation of equipment is not expected to create a nuisance.
- RULE 1107 The coatings and solvents used on metal parts during the maintenance contains less than 50 g/l of VOC. Therefore, compliance with this rule is expected.
- RULE 1136: The coatings and solvents used on wood products contains less than 50 g/l of VOC. Therefore, compliance with this rule is expected.
- RULE 1171 Acetone is used as a clean-up solvent which is considered an exempt compound. Therefore, compliance with this rule is expected.
- REG. XIII 1303(a): The VOC emissions from the spray booths are less than 39 lbs/day which would not require an afterburner. The particulate emissions are controlled by > 2 inch filter media which is BACT for this equipment. Thus, the requirements of this section are satisfied. .
- 1303(b) (1): The modeling requirements do not apply to ROG emissions at this time.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	5
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

1303(b) (2): External offsets are not required as the 30-day ave. is less than 0.49 lb/day.

Also, electric compressor is used for the portable spray booth and therefore, there are no other criteria pollutant emissions except for VOC and PM during the operation.

RULE 1401 Compliance with this rule is expected as the MSDS submitted indicates the VOC of products containing no toxics compounds listed in Rule 1401.

Regulation XX: The proposed project does not increase NO_x or SO_x emissions and thus this regulation is not applicable.

Regulation XXX:

This facility is in the RECLAIM/Title V program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the emission threshold levels on the following page:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 5th permit revision to the Title V renewal permit issued to this facility on August 3, 2007. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	6
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

Title V Permit Revisions Summary

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
Previous Revisions	Installation of new pressure washers & removal of old Pressure washers.	0	0	0	0	0	0
5 th	Permit Revision: Installation of 3 spray booths (a/nos. 519363, 65-66).	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimus significant permit revision”.

CONCLUSION:

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimus significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed facility permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised RECLAIM/Title V permit will be issued to this facility with the following conditions:

CONDITIONS:

A63.2. The operator shall limit emissions from this equipment as follows:

<u>CONTAMINANT</u>	<u>EMISSIONS LIMIT</u>
VOC	Less than or equal to 14 LBS IN ANY ONE MONTH

For the purposes of this condition, the limit(s) shall be based on the total combined emissions from equipment under device nos. D305, D306, and D307.

To ensure compliance with the monthly Volatile Organic Compound (VOC) emission limit(s) of this condition, the operator shall comply with the following recordkeeping requirements:

- (1) The operator shall comply with Rule 109 (Recordkeeping for Volatile Organic Compound Emissions).
- (2) Within 14 calendar days after the end of each month, the operator shall total and record VOC emissions for the month from all equipment and operations covered by the monthly emission limit(s). The record shall include any procedures used to account for control device efficiencies

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	7
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.

(3) The operator shall maintain a single list which includes only the name and address of each person from whom the facility acquired VOC-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.

(4) The operator shall retain all purchase invoices for all VOC-containing material used or stored at the facility, and all waste manifests for all waste VOC-containing material removed from the facility, for five years.

B27.5. The operator shall not use materials containing any compounds identified in the SCAQMD Rule 1401 (except for those compounds listed below) as amended 09/10/2010.

COMPOUND	CAS NO.	
Zinc and Zinc Compounds	7440-66-6	

C6.1. The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filters.

The operator shall determine and record the parameter being monitored once every 7 days.

D322.1. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

E175.1. The operator shall not use this equipment unless all exhaust air passes through the filter media at least 2 inches thick.

H23.2. This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District	Rule 109
PM	District	Rule 481

K67.2 . The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGE	8
ENGINEERING AND COMPLIANCE DIVISION	APPL. NOS.	See Pg. 1
APPLICATION PROCESSING AND CALCULATION	PROCESSED BY	HD
	CHECKED BY	
	DATE	05/31/11

- the name of the person performing the inspection and/or maintenance of the filter
- the date, time and results of the inspection
- the date, time and description of any maintenance or repairs resulting from the inspection.